NATIONAL CREDIT UNION ADMINISTRATION

YEAR 2000 QUARTERLY CONGRESSIONAL UPDATE

December 9, 1998

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INDUSTRY PROGRESS

Credit Union Remediation Status:

As indicated previously (Congressional Update dated May 15, 1998), NCUA planned to categorize risk based on the three-tiered system developed by other federal financial regulators (satisfactory, needing improvement, or unsatisfactory). After further review we determined it is counterproductive to alter our system of risk ratings (high, medium, or low) to coincide with those developed by other federal financial regulators. However, for purposes of this report, we will interpret our risk assessment in terms of the rating system used by other federal financial regulators. Our interpretation is as follows:

- ♦ Credit unions with an administrative action in place are rated as *unsatisfactory*;

- ♦ Credit unions rated by our staff as high risk relate to a rating of *needing improvement* to operations; and,

- ♦ Credit unions rated by our staff as medium or low risk correlate to progressing *satisfactorily* with regard to Year 2000 issues.

The breakdown of federally insured credit unions' ratings, including corporate credit unions, based on the milestone dates established in the NCUA contingency plan are as follows:

Rating	Current	Last Report	% Change
Unsatisfactory	35	29	21%
Needs Improvement	512	895	(43%)
Satisfactory	10,460	10,525	(.6%)
Unrated[1]	99	146	(25%)
Non-Federally Insured[2]		(475)	
Total	11,106[3]	11,120	

[1] Unrated credit unions refer to credit union of which we are lacking a rating; examples being: newly chartered credit unions; manual credit unions; recent charter conversions; and state-chartered credit unions in states which are not participating fully with our rating program.

[2] In our last report, we included statistics on non-federally insured credit unions - the majority reported in the Satisfactory category. We will not report on non-federally insured credit unions for this report, and all future reports.

[3] Since our last report, 14 credit union charters became inactive either through merger, liquidation or conversion. Attachment-1 cites the total number of credit unions as 11,099 which is the most current number of active credit unions as of 11/24/98 reflecting routine charter cancellations.

Our oversight efforts continue to identify those federally insured credit unions requiring additional supervisory attention as the renovation phase ends and the testing phase begins. Movement from "needs improvement" to "unsatisfactory" is a function of our administrative action process. Attachment-1 contains an aging of credit unions rated "needs improvement" or "unsatisfactory." In our September 10, 1998, testimony, we reported 29 credit unions in the unsatisfactory category. Of these 29 credit unions, 5 moved to the needs improvement category. In addition, 11 credit unions moved into the unsatisfactory category since our last report, primarily due to the following reasons: (1) inadequate Y2K plan, (2) inadequate due diligence process for risks posed by service providers/software vendors, (3) inadequate test plan, (4) inadequate contingency plan, and (5) inadequate customer awareness program.

Our Needs Improvement category has seen a 43% reduction since our last report. A total of 431 credit unions' ratings moved from this category to the satisfactory category. Conversely 48 credit unions' ratings moved into the needs improvement category. The significant improvement in ratings is the result of increased awareness and progress made by the officials of the credit unions. Additionally, the examiner staff - with increased guidance - report the ratings on a more consistent basis since the initial ratings had been made.

In some cases, a credit union may be progressing in a satisfactory manner, but also be outside the timeframes established by the NCUA. Credit unions falling into this category are granted a waiver from administrative action by the regional director, after a review is conducted. All waivers must receive concurrence by the Office of Examination and Insurance. Waivers are monitored on a monthly basis. As of this report, there are 28 waivers outstanding. NCUA has granted 94 waivers, and removed 66 waivers since the beginning of our program.

We continue to obtain and update the rating on all federally-insured credit unions through the examination and supervision process.

Remediation Progress:

Those federally insured credit unions utilizing a computerized recordkeeping system which have not completely implemented all mission critical systems continue to report their Year 2000 remediation progress quarterly. Credit unions continue to demonstrate good progress with respect to renovating, testing, and implementing mission critical systems. The results of the most recent quarter-end reporting cycle (September 30, 1998) are illustrated in Attachment-2. In reviewing this data, it is important to remember that some credit unions have multiple mission critical systems, and may report some systems in renovation, some in testing, and some systems as already implemented. Therefore, a credit union may be in one or more phase of each category.

INFORMATION SYSTEMS VENDOR REVIEWS

As reported during the last Congressional Update, the agency received examination authority over information system providers in March. Relevant information for each vendor, such as products, test release dates, and general release dates, is available to the general public through the agency's web site.

In April, NCUA concluded initial Year 2000 reviews of ten large information system providers. We contracted with PricewaterhouseCoopers (formerly Coopers and Lybrand) to perform the reviews, along with our own examiner staff. We selected the initial ten based on the substantial number of credit unions they serve; nearly 55 percent of all federally insured credit unions. Once the reviews were completed, we published a Letter to Credit Unions (98-CU-11) to summarize the results of the reviews. All ten of the initial vendors reviewed demonstrated satisfactory progress - at that point in time - with their Year 2000 remediation efforts.

NCUA contracted with PricewaterhouseCoopers to conduct 50 additional information system provider/large, complex credit union reviews. We augmented the expertise of the PricewaterhouseCoopers staff with at least three NCUA employees. The majority of NCUA participants were our supervisory examiner group Y2K Specialists. This approach allowed us to increase the experience base of the Specialists, through their participation on several reviews. PricewaterhouseCoopers' expertise and training developed our examiners to become the examiner-in-charge of subsequent reviews. We will complete our reviews by January of 1999. We have 3 vendor reviews to complete, along with one large complex credit union. Our reviews will represent 80 percent of the credit unions serviced by information system providers, and will cover 74 percent of the assets of credit unions insured by the NCUSIF. We discovered no major findings from the reviews; both vendors and credit unions are progressing well with their Year 2000 remediation efforts. We will provide the results of the reviews to the client credit unions, and a summary of findings will be available through NCUA's web site.

PHASE II WORKPROGRAM - TESTING & IMPLEMENTATION

All of our Year 2000 field and regional specialists attended Year 2000 testing training sponsored by the FFIEC; they became a resource in the testing workprogram for our general examination staff. We adapted the Testing Program developed by the FFIEC to NCUA needs and implemented the Program during the 3rd quarter of this year. We have shared the Program with the state supervisory authorities and encouraged them to adopt the program for their state-chartered credit unions.

In addition to the FFIEC training provided to our regional office and field Y2K Specialists, a vendor conference, held in May, included training on testing methodologies for the supervisory examiner group Y2K Specialists. Finally, we provided specialized Y2K testing training to our general field staff during three conferences held during the summer.

The agency also hired two more Information Systems Officers (for a total of three), working from our headquarters, to assist in managing, monitoring, and tracking our Y2K efforts. NCUA has reallocated budget resources to address Y2K in 1999. NCUA's proposed 1999 budget includes 104,509 hours specifically allocated for Y2K; therefore, providing sufficient resources to follow up on all Y2K testing and implementation issues and concerns.

CREDIT UNION EDUCATION EFFORTS

Since our last report, we have issued a Letter to Credit Unions explaining the Phase II Workprogram. Since initiating our Year 2000 Program, we have issued 15 Year 2000 Letters to Credit Unions, in addition to several other educational papers, such as the Small Credit Union Guide, and the Year 2000 Survival Guide. We plan to issue additional letters that specifically address liquidity issues, crisis management, and planning for Year 2000 Day One operations. NCUA continues to offer our assistance to various trade organizations by participating in education workshops through which we have reached over 19,000 participants. Our Office of Community Development Credit Unions recently conducted "Empowerment 2000" workshops in Phoenix, Miami, and St. Louis which included a very successful Year 2000 session.

NCUA INSPECTOR GENERAL

NCUA's Inspector General is currently collecting information to perform a detailed review of our Year 2000 efforts to date, as well as actions we plan to initiate. We anticipate receiving a management letter detailing the findings of the review by the fourth quarter of 1998.

SYSTEMIC Y2K RISKS

Liquidity Risks:

NCUA continues to analyze and position the National Credit Union Share Insurance Fund's expected cash flows for the fourth quarter of 1999, to ensure ample liquidity is available to credit unions and the agency. The Chairman of the NCUA Board has testified before the House Banking Committee supporting removal of the limitation on Central Liquidity Facility borrowing and the Agency is working on alternatives to assure credit union liquidity needs are supported through the CLF. Guidance will be issued to credit unions in this area in a letter to credit unions. Additionally, examiner staff will be discussing liquidity planning with credit union officials during each contact to ensure management is taking appropriate steps to address liquidity planning - such as establishing additional lines of credit; maintaining short term investments; and effectively monitoring the flow of funds.

NCUA's Business Resumption Plan will outline agency actions and will require all NCUA examiners to review credit unions' liquidity plans during examinations completed in 1999. Examiners will also be expected to monitor credit unions' liquidity situation

throughout the last quarter of 1999 and the first quarter of 2000. Credit unions will be expected to monitor local media for any potential liquidity concerns relating to the financial industry. In early 1999, we plan to develop a letter for all federally insured credit unions addressing liquidity planning and crisis management.

In addition to the normal liquidity contingency plans in place, some corporate credit unions are planning for additional Y2K liquidity contingencies by:

   a) Restructuring balance sheets to increase liquidity (i.e. have a major portion of securities mature by December 31, 1999);

   b) Obtaining committed lines of credit; and

   c) Marketing Y2K certificates of deposit to coincide with possible Y2K liquidity needs.

NCUSIF Risks:

Regions report monthly on the potential share insurance fund risks with a special section relating to Y2K. Implementation milestone dates (July 31, 1999, and September 30, 1999) will trigger any necessary liquidation action. NCUA's Business Resumption Plan includes staffing crisis management teams for large credit union failures before and after the Year 2000.

As each milestone date is reached, examiners determine if federally insured credit unions have progressed sufficiently or whether administrative action is needed to compel credit unions to take specific steps.

We have seen one corporate credit union decide to merge due to Year 2000 concerns; due to its small asset size, the corporate is a low industry risk.

BUSINESS RESUMPTION PLAN

NCUA is in the process of developing an agency-wide Year 2000 Business Resumption Plan which identifies and evaluates the needs and logistics for any emergencies that arise from the Year 2000 date change. The following is an overview of the major elements of our Business Resumption Plan:

A. Prepare Letters to Credit Unions:
   Liquidity Planning and Year 2000
   Crisis Management and Addressing the Media
   Backing-up Data and Suggested Strategy for Day One System Operation/Testing

B. Expand on NCUA's January 1998, contingency plan to include a more detailed National Liquidity Response Plan to address several levels of risks including multiple regional demands or a single large credit union liquidity need.

C. Develop Year 2000 crisis response procedures for each office and update disaster recovery plans or develop individual office business resumption plans.

D. Develop and coordinate plans and information to assist in vendor conversions for natural person credit unions.

E. Develop and coordinate plans and information to assist in vendor conversions for corporate credit unions.

F. Develop a Year 2000 Technical Resumption Plan that identifies internal systems and their readiness.

G. Prepare necessary legal support or provide for other contingencies including contracted services and delegated authorities for prompt action.

AGENCY PROGRESS

Organizational Responsibilities:

There are two aspects to NCUA's Y2K efforts. The first deals with our internal information systems and related information technology: IT resources, external data interfaces, and certain aspects of the Agency's infrastructure containing embedded computer technology, (e.g., fire detection and suppression systems, elevator systems, telephone systems, security systems, and environmental control systems). The second is our regulatory effort to ensure the successful Y2K readiness of the natural person credit unions insured by NCUA and the 39 corporate credit unions.

The NCUA Board has primary Year 2000 oversight responsibility. Specific oversight coordination is through the Director of Strategic Planning, an executive level position located in NCUA's headquarters in Alexandria, Virginia. The Director of Strategic Planning reports to the Executive Director, who in turn reports to the NCUA Board.

The Office of Examination and Insurance is responsible for programs monitoring and supervising the readiness of federally-insured credit unions. The Office of Corporate Credit Unions is responsible for programs monitoring and supervising the readiness of corporate credit unions. The Chief Information Officer (Director of the Office of Technology and Information Services) is responsible for the Y2K readiness of all of NCUA's internal information technology resources. The Director of Administration is responsible for the Y2K readiness of the agency's physical plant facilities.

The Director of Strategic Planning is responsible for coordination and oversight for all NCUA Year 2000 programs. Each office provides a monthly Year 2000 update to the Executive Director and the NCUA Board through the Director of Strategic Planning.

Monitoring of problems with meeting internal target dates are identified and resolved through this process. The Office of Inspector General also monitors target dates and progress and is responsible for reporting any concerns to the NCUA Board.

The Office of Examination and Insurance monitors Federally insured credit unions and the Office of Corporate Credit Unions monitors Corporate credit unions. The status of credit union readiness is reported by examiners during their supervision and examination contacts and by specific Year 2000 reporting provided quarterly by all federally insured credit unions. These status reports are measured against the contingency plan targets for accomplishing various levels of readiness established by the NCUA Board.

Agency-Wide Status of the Total Number of Mission-Critical Systems:

All of our internally developed systems are Y2K ready.

Total Number of Mission Critical	Number Ready	Number to be Replaced	Number to be Repaired (Validated)	Number to be Retired
7	7	0	0	0

Progress in fixing non-mission critical systems:

- Completed all renovation and verification activities; placed renovated systems into production.
- Coordinated with all NCUA offices and inventoried products/services with embedded date technology, (e.g., security, fire detection and suppression, environmental (HVAC), elevators, garage doors).
- Coordinated with all NCUA offices and inventoried third party computerized systems, (e.g., Westlaw and Bloomberg).
- Contracted with outside vendor to obtain written Y2K readiness documentation from all third parties providing products, services, and systems to the agency. We are currently reviewing the responses from our letters sent to vendors and are testing these systems for Y2K readiness. We will continue to work with all our vendors until all externally supplied systems are verified ready.

Status of efforts to inventory all data exchanges with outside entities:

Our Office of Technology and Information Services has compiled an inventory of all external data exchanges. We are currently testing these interfaces for Y2K readiness as part of our overall agency Y2K testing plan.

NCUA has developed a common shared credit union examination system and credit union call report with state credit union regulatory authorities. Therefore, as changes to these systems occur, they are automatically provided to the state regulatory authorities assuring that both parties have updated systems which are Year 2000 ready.

Contingency planning activities:

For our internal systems, we have drafted a Year 2000 Technical Resumption Plan. This plan lists all automated systems – hardware, software, and technical infrastructure – that NCUA uses in the performance of its daily business. The Year 2000 Technical Resumption Plan identifies each agency technical system, product and service; its vendor; and the current Year 2000 readiness status. Furthermore, the Year 2000 Technical Resumption Plan identifies specific steps to follow if a particular system, product, or service is not fully ready or otherwise fails when we enter the new millennium.

We also have a Disaster Recovery Plan, which will be implemented in the event of any disaster, including a Y2K failure, that causes an interruption of service in one of our critical systems.

We will test the plan in December 1998.

Other Year 2000 Implications:

We have inventoried all non-IT components of the agency's physical plant with potential embedded computer technology, (e.g., building security, fire detection and suppression, elevator, and environmental control systems). These components are included in our overall Y2K readiness plan.

Government-Wide Systems:

We had originally planned to convert our GSA-supplied PIRS human resources system to SAP, our internal enterprise support system. We now plan to remain a customer of GSA for human resources support. GSA is developing a new human resources system, CHRIS, and has scheduled NCUA for conversion from PIRS to CHRIS in June 1999. GSA notified us that CHRIS will be fully Y2K ready. Our contingency plan, should CHRIS not be ready as scheduled, is to remain on the PIRS system, which is currently being made Y2K ready by GSA.

Our Chief Financial Officer utilizes several systems owned and operated by the Treasury Department and GSA. We are currently working with these agencies, based on their schedules, to test and validate Y2K readiness of each of their systems.

Verification Efforts:

In order to get an independent assessment of our readiness status, we submitted our test documentation and initial results to KPMG Peat Marwick (KPMG). They have conducted two reviews of our test plans, processes, and procedures. KPMG will return in December to conduct a final review.

If and when we deploy new hardware or software systems currently planned for 1999, we will again submit our verification testing results and documentation to KPMG for an independent assessment of the readiness status of these systems.

Finally, we have also implemented a configuration management control system to ensure that ready systems remain ready. As each system was assessed ready, we moved the source code for the system into our Visual Source Safe repository. No new software will go into production without first being tested for Y2K readiness, then checked into Visual Source Safe.

Other Areas of Progress:

All internal agency application systems are fully Y2K ready and in production. Our initial end-user test of all systems in June 1998 turned up a few minor problems, which we corrected. We conducted additional tests in August and September, which confirmed that all of our internal systems are now ready. We distributed all renovated systems to users in November; these systems are now in production.

Costs: The following table provides the estimates of Year 2000 information technology costs (Report totals in millions).

Fiscal Year	1996	1997	1998	1999	2000	Total
Internal Systems	$0.7	$2.2	$0.6	$0.1	$0*	$3.6
Regulatory Program	$0	$1.1	$7.1	$16.4**	$6.4**	$31.0

*   We anticipate no Y2K-related costs for internal systems in Fiscal Year 2000.

**   Indirect Costs have been included. We have recently revised our Regulatory Program cost estimates to reflect indirect costs in addition to direct costs. Inclusion of indirect costs associated with the Year 2000 has resulted in an increase to the originally budgeted Regulatory Program costs. The indirect costs are composed of overhead and nonproductive time associated with the Regulatory Program.

AGENCY TESTING TO DATE

We have completed our plan for testing, repairing, and verifying our internally developed and maintained systems. We conducted end user tests of our systems in June, August, and September 1998, which confirmed that all production systems are ready.

We have not established "trigger dates" because we completed all necessary renovation work on internal systems and placed the ready systems into production. As a result, our Technical Resumption Plan will only be triggered by an actual and unanticipated system failure.

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State	<$5M U <3	U 3-6	U >6	NI <3	NI 3-6	NI >6	$5-10M U <3	U 3-6	U >6	NI <3	NI 3-6	NI >6	$10-50M U <3	U 3-6	U >6	NI <3	NI 3-6	NI >6	>$50M U <3	U 3-6	U >6	NI <3	NI 3-6	NI >6	Totals	Total Cus	State
AK																		2					1		3	13	AK
AL					1							1						2						1	5	196	AL
AR						4																			4	85	AR
AZ					1	3						1						4				1	1	1	12	71	AZ
CA		1				3						1											1	2	8	694	CA
CO						2						3					1	1					1	7	15	185	CO
CT		1	1	3	1	3												1							10	221	CT
DC						3											1	1							5	79	DC
DE						2						1		1											4	46	DE
FL						4								1				3						1	9	265	FL
GA	1	2			1	5				1		2	2					1				1	1		17	241	GA
GU																									0	2	GU
HI																									0	112	HI
IA						1																			1	209	IA
ID						2						1											1	1	5	59	ID
IL					22	3					3	1					5	1						1	36	596	IL
IN						2		1																4	7	255	IN
KS				1		1																			2	146	KS
KY					1	4						2		1											8	141	KY
LA						5								1									1	1	8	296	LA
MA	1	1	1	1		1				1				1			2	2							11	310	MA
MD				1	1	1																	1		4	134	MD
ME	1				1							1				1		3					1	1	9	90	ME
MI						1											1	2				1		2	7	500	MI
MN				1	2					1							2	4					1	5	16	199	MN
MO						2																			2	201	MO
MS																									0	134	MS
MT																									0	83	MT
NC				1	2	1						1						2					1	1	9	186	NC
ND																						3			3	69	ND
NE				1		6												2						2	11	95	NE
NH												1										1			2	34	NH
NJ				1	2	18				1		2						8						3	35	314	NJ
NM																		1						2	3	58	NM
NV																									0	26	NV
NY	2	4	3		2	8		1		1	1	2		1	1		1	1				1			29	689	NY
OH					1	5						3						7						2	18	536	OH
OK						1					2	2						2						3	10	100	OK
OR																									0	124	OR
PA				4	5	31				1	2	7				1		13	1			2	1	2	70	855	PA
PR																									0	21	PR
RI													1												1	42	RI
SC						1																			1	104	SC
SD						5						1						5					1		12	65	SD
TN						1						1						3							5	262	TN
TX				2	1	25				2	3	10				3	2	31					3	7	89	769	TX
UT						1					1							1					1		4	144	UT
VA					1	9						1					1	6					3	3	24	267	VA
VI																									0	5	VI
VT																									0	46	VT
WA				1										1										4	6	181	WA
WI						2					1	1						1							5	367	WI
WV																		1							1	138	WV
WY						1																			1	39	WY
																									0		
																									0		
																									0		
																									0		
Totals	5	9	7	17	46	164	0	3	0	7	13	46	1	3	2	10	16	111	1	1	3	5	22	55	547	11,099	Totals

Unsat	35
N.I.	512
	547

RENOVATION PHASE[1]

Completion Category Percentage	# of Credit Unions at 9/30/98	9/30/98 % of Credit Unions with Systems in Completion Category	6/30/98 % of Credit Unions with Systems in Completion Category	3/31/98 % of Credit Unions with Systems in Completion Category	12/31/97 % of Credit Unions with Systems in Completion Category	# of Critical Systems at 9/30/98	9/30/98 % of Systems-Completion Category	6/30/98 % of Systems - Completion Category	3/31/98 % of Systems - Completion Category	12/31/97 % of Systems - Completion Category
0 to 25%	1,512	8.8%	13.0%	19.3%	38.3%	7,612	5.7%	12.8%	24.7%	59.3%
26% to 50%	1,600	9.4%	15.4%	21.6%	24.9%	5,971	4.5%	10.7%	19.4%	18.2%
51% to 75%	2,724	15.9%	20.5%	19.3%	17.9%	10,480	7.9%	16.0%	12.6%	10.0%
76% to 99%	4,225	24.6%	25.9%	22.3%	14.3%	19,851	15.2%	21.9%	21.6%	9.3%
Compliant	7,055	41.3%	25.3%	17.5%	4.6%	87,995	66.7%	38.7%	21.8%	3.0%
Total		100%	100%	100%	100%		100%	100%	100%	100%

TESTING PHASE

Completion Category Percentage	# of Credit Unions at 9/30/98	9/30/98 % of Credit Unions with Systems - Completion Category	6/30/98 % of Credit Unions with Systems - Completion Category	3/31/98 % of Credit Unions with Systems - Completion Category	12/31/97 % of Credit Unions with Systems - Completion Category	# of Critical Systems at 9/30/98	9/30/98 % of Systems - Completion Category	6/30/98 % of Systems - Completion Category	3/31/98 % of Systems - Completion Category	12/31/97 % of Systems - Completion Category
0 to 25%	4,365	23.6%	28.2%	30.0%	38.9%	35,318	32.6%	36.2%	41.7%	51.3%
26% to 50%	2,603	14.2%	14.1%	17.5%	22.8%	10,298	9.5%	9.8%	15.0%	19.8%
51% to 75%	2,893	15.8%	17.1%	15.8%	20.0%	10,109	9.3%	13.0%	10.5%	16.8%
76% to 99%	4,003	21.9%	17.8%	16.5%	14.0%	17,378	16.0%	12.9%	12.3%	9.0%
Compliant	4,414	24.6%	22.9%	20.2%	4.2%	35,342	32.6%	28.1%	20.5%	3.0%
Total		100%	100%	100%	100%		100%	100%	100%	100%

[1] Credit unions relying on vendors are required to report systems in the renovation phase until a vendor has delivered the system to the credit union. If a vendor is in the renovation phase for a system, the credit union reports that system in the 26% to 50% completion category. If the vendor is in the testing phase, the credit union reports that system in the 51% to 75% completion category for the renovation phase. If the vendor is in the implementation phase, the credit union reports that system in the 76% to 99% renovated completion category. Consequently, the above reporting is a more conservative approach.

IMPLEMENTATION PHASE

Completion Category Percentage	# of Credit Unions at 9/30/98	9/30/98 % of Credit Unions with Systems - Completion Category	6/30/98 % of Credit Unions with Systems - Completion Category	3/31/98 % of Credit Unions with Systems - Completion Category	12/31/97 % of Credit Unions with Systems - Completion Category	# of Critical Systems at 9/30/98	9/30/98 % of Systems - Completion Category	6/30/98 % of Systems - Completion Category	3/31/98 % of Systems - Completion Category	12/31/97 % of Systems - Completion Category
0 to 25%	1,443	15.9%	15.2%	15.6%	21.3%	6,019	11.2%	13.8%	13.0%	22.4%
26% to 50%	583	6.5%	7.4%	9.0%	13.6%	1,643	3.1%	4.5%	7.0%	8.9%
51% to 75%	685	7.5%	9.2%	8.5%	14.6%	2,069	3.8%	4.6%	4.8%	10.5%
76% to 99%	1,407	15.5%	15.7%	24.0%	35.1%	6,997	13.0%	12.2%	23.8%	32.9%
Compliant	4,957	54.6%	52.4%	42.9%	15.4%	37,020	68.9%	64.9%	51.5%	25.1%
Total		100%	100%	100%	100%		100%	100%	100%	100%